

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW HAMPSHIRE**

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Laurie Ortolano,	:	
	:	
Plaintiff	:	
	:	
v.	:	1:22-cv-00326-LM
	:	
	:	
The City of Nashua, New Hampshire, et al.	:	
Defendants	:	

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**ASSENTED-TO MOTION TO EXTEND TIME TO FILE AN
OBJECTION TO DEFENDANT BOLTON’S AND LEONARD’S
MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiff Laurie Ortolano respectfully files this fully Assented-to Motion to Extend the Deadline to File an Objection to Defendant Bolton’s and Leonard’s Motion for Judgment on the Pleadings [Doc. No. 52] from March 10, 2023 to March 24, 2023. In support of this motion, Plaintiff states the following.

1. Defendants Bolton and Leonard filed a motion for judgment on the pleadings [Doc. No. 52] on February 24, 2023.
2. Based on the date of the original filing, Plaintiff’s Objection is due on or before March 10, 2023.
3. Because of continuing health concerns involving respiratory problems possibly caused by COVID-19, counsel needs additional time to file a substantive response and therefore seeks an extension of fourteen (14) days of this filing deadline to allow the objection to be filed by Friday, March 24, 2023.
4. The extension will not require continuation of any other pending deadlines or hearings in this matter.

6. Defendants' counsel has kindly assented to this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Extend Plaintiff's deadline to file an objection to March 24, 2023; and
- B. Grant such further relief as justice requires.

Respectfully submitted,

LAURIE ORTOLANO

By her attorneys,

March 5, 2023

By: /s/ Kurt S. Olson
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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: March 5, 2023

By: /s/ Kurt S. Olson
Kurt S. Olson